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Attorneys for Defendant
OHM SHREE LAXMI, LLC,
dba Days Inn by Wyndham Hayward Airport

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ELIZABETH CHAVEZ

Plaintiff,

v.

OHM SHREE LAXMI, LLC,

Defendant.

CASE NO. 4:22-cv-02170-DMR
Civil Rights

**JOINT STATUS REPORT AND ORDER TO
CONTINUE THE GENERAL ORDER 56
DEADLINES TO COMPLETE THE
SETTLEMENT MEETING AND FOR
FILING THE NOTICE OF NEED FOR
MEDIATION**

Action Filed: April 6, 2022

Plaintiff ELIZABETH CHAVEZ and Defendant OHM SHREE LAXMI, LLC – Plaintiff
and Defendants together the “Parties” – hereby submits the following status report pursuant to the
Court’s Order of September 28, 2022. Additionally, the Parties stipulate and request that the
Court extend the case deadlines associated with General Order 56 for the Parties to hold a

1 settlement meeting of the Parties and file a notice of need for mediation under General Order 56.

2 This request for an extension of time of the case deadlines is based on the following good cause:

- 3 1. Plaintiff filed this action on April 6, 2022. Dkt. No. 1.
- 4 2. Defendant filed an Answer to the Complaint on June 2, 2022. Dkt. No. 10.
- 5 3. The Parties were unable to find a mutually agreeable time to hold the site inspection
- 6 pursuant to General Order 56.
- 7 4. On August 16, 2022, Plaintiff filed a motion to enforce General Order 56 requesting
- 8 that the Court order Defendant to provide dates for a site inspection. Dkt. No. 16.
- 9 Defendant did not respond to Plaintiff's motion. The Court granted Plaintiff's motion
- 10 and ordered the Parties to meet and confer to find a mutually agreeable date for the
- 11 site inspection. Dkt. No. 18.
- 12 5. The Parties ultimately held the joint site inspection on September 28, 2022. Plaintiff's
- 13 access consultant needs at least three weeks to complete his report which will identify
- 14 the barriers to access at the subject premises.
- 15 6. Plaintiff needs her access consultant's report in order to provide Defendant with a
- 16 comprehensive demand to settle the injunctive relief in this matter. The Parties agree
- 17 that a settlement meeting will not be productive until Plaintiff has made her demand
- 18 for injunctive relief.
- 19 7. The Parties jointly stipulate and request that the Court continue the case deadlines as
- 20 follows:

21 Deadline for Parties to hold a video conference meeting of parties: November

22 2, 2022

23 Deadline to file a Notice of Need for Mediation: November 9, 2022.

24 **IT IS SO STIPULATED.**

25 Date: October 5, 2022

REIN & CLEFTON

26 /s/ Aaron M. Clefton

27 By AARON M. CLEFTON, Esq.

28 Attorney for Plaintiff

ELIZABETH CHAVEZ

1 Date: October 4, 2022

ANDERIES & GOMES LLP

2 /s/ Allan J. Gomes
3 By ALLAN J. GOMES, Esq.
4 Attorney for Plaintiff
OHM SHREE LAXMI, LLC

5 **FILER'S ATTESTATION**

6 Pursuant to Local Rule 5-1, I hereby attest that on October 4, 2022, I, Aaron Clefton,
7 attorney with Rein & Clefton, received the concurrence of Allan J. Gomes in the filing of this
8 document.

9 /s/ Aaron Clefton
10 Aaron Clefton, Esq.

ORDER

Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO ORDERED.

The case deadlines are continued as follows:

Deadline for Parties to hold a video conference meeting of parties: November 2, 2022

Deadline to file a Notice of Need for Mediation: November 9, 2022.

Dated: October 5, 2022

